

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**SECOND AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

**TO: Eric Abraham, Esq.**  
**Hill Wallack LLP**  
**21 Roszel Road**  
**Princeton, New Jersey 08540**

*Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Dr. Murali Nagabelli, Associate Vice President, Chemical Research and Development, on June 3 and 4, 2021, at 8:00 a.m. pacific time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: May 21, 2021

By: /s/ Andrés Rivero  
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*Counsel for MSP Recovery Claims,  
Series LLC*

**EXHIBIT A**

**30(B)(6) TOPICS**

**Testing**

14. HLL's evaluation of the potential risks to the purity or contents of HLL's API posed or caused by solvents used during the manufacturing process.

**Process Development**

26. The development of each Drug Master File for HLL valsartan API sold in the United States, including any risk assessments conducted on starting materials, or solvents.

27. The use of solvents, and the Tetrazole ring formation step, in the manufacturing process for HLL's valsartan API, including: (1) the reasons for each, and any modifications, (2) the testing and evaluation in connection with each, including any modification, and (3) the relationship between each, including any modifications, and the nitrosamine contamination of HLL's valsartan API.

29. HLL's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for HLL's valsartan API.

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Dr. Murali Nagabelli.
2. The complete production of Dr. Murali Nagabelli's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Andrés Rivero  
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Series LLC*